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U.S. Bankruptcy Court Southern District of California 325 West 'F' Street, San Diego, CA 92101

In re:
Bankruptcy No. 08-01077-B-13
Hearing Date: 4/16/2008

Hearing Time: 10:00 AM

**Department:** D-4

## TRUSTEE'S OBJECTIONS TO CONFIRMATION OF CHAPTER 13 PLAN

Thomas H. Billingslea, Jr., the Standing Chapter 13 Trustee, hereby objects to confirmation and moves to dismiss. The basis for the objection is:

**Plan Length:** The Plan length is over 60 months. [1322 (d)]

## The plan is incomprehensible or internally inconsistent and the Trustee cannot administer i in current format

- Need to file amended Chapter 13 Plan.

Plan Payments: Inability to make timely plan payments. [1325 (a) (6)]

The Trustee cannot recommend confirmation until the Debtor provides proof of the ability to make the ongoing mortgage payments and remain current in the Chapter 13 plan payment as of the date of the confirmation hearing.

The Plan is not proposed in good faith or does not comply with Code provisions.

## **Additional Objection:**

Real estate creditor listed in conflicting plan paragraphs. Debtor no longer employed at Cubic per Schedule I

## PLEASE BRING A COPY OF YOUR MOST RECENT PAYMENT TO THE HEARING

Dated March 14, 2008.

/s/ Thomas H. Billingslea, Jr.

Thomas H. Billingslea, Jr.

Chapter 13 Standing Trustee